

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: Angel Hughes	)	
	)	Case No: 17 B 11836
	)	Judge: Doyle
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION**

**Served upon the following parties electronically:**

**Office of United States Trustee**, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

**Trustee:** Tom Vaughn, 55 E. Monroe Street, Ste. 3850, Chicago, IL 60603

**and served upon the following parties via U.S. Mail:**

**Debtor:** Angel Hughes, 37 N. Latrobe Ave., Chicago, IL 60644

**See Attached Service List**

PLEASE TAKE NOTICE that on February 27, 2018 at 10:00 a.m.,  
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge  
Doyle, or any other Bankruptcy Judge presiding in her place in Courtroom 742 of the  
Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion  
to Modify Plan, and shall request that the attached Order be entered, at which time you  
may appear if so desired.

**PROOF OF SERVICE**

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before February 6, 2018.

/s/ Michelle K. Hinds  
Michelle K. Hinds  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001

Label Matrix for local noticing  
0752-1  
Case 17-11836  
Northern District of Illinois  
Chicago  
Tue Feb 6 11:26:43 CST 2018

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Americash Loans, L.L.C.  
P.O. Box 184  
Des Plaines, IL 60016-0003

Brandon S. Lefkowitz  
24100 Southfield Road  
Suite 203  
Southfield, MI 48075-2851

Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

City of Chicago Department of Finance  
c/o Arnold Scott Harris  
111 W Jackson Blvd Ste 600  
Chicago, IL 60604-3517

City of Chicago Parking  
Dept of Revenue  
PO Box 88292  
Chicago, IL 60680-1292

Comenity Bank/Lane Bryant  
Attn: Bankruptcy  
Po Box 182125  
Columbus, OH 43218-2125

Fed Loan Sevicng  
Po Box 69184  
Harrisburg, PA 17106-9184

First Premier Bank  
601 S Minneapolis Ave  
Sioux Falls, SD 57104

PLS Loan Store  
1617 N. Cicero  
Chicago, IL 60639-4519

PRESTIGE FINANCIAL SERVICES  
PO BOX 26707  
SALT LAKE CITY, UT 84126-0707

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Premier Bankcard, LLC  
Jefferson Capital Systems, LLC Assignee  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

(p)PRESTIGE FINANCIAL SERVICES  
PO BOX 26707  
SALT LAKE UT 84126-0707

Regional Acceptance Co  
304 Kellm Road  
Virginia Beach, VA 23462-2712

Synchrony Bank/ Old Navy  
Attn: Bankruptcy  
Po Box 956060  
Orlando, FL 32896-0001

The Payday Loan Store  
c/o Creditors Bankruptcy Service  
P O Box 800849  
Dallas, TX 75380-0849

U.S. Department of Education  
c/o FedLoan Servicing  
P.O. Box 69184  
Harrisburg, PA 17106-9184

US Dept of Education  
Attn: Bankruptcy  
Po Box 16448  
Saint Paul, MN 55116-0448

Angel M. Hughes  
37 N Latrobe Ave  
Chicago, IL 60644-3333

Jason Blust  
Law Office of Jason Blust, LLC  
211 W. Wacker Drive  
Ste. 300  
Chicago, IL 60606-1390

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Tom Vaughn  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Portfolio Recovery Associates, LLC  
Successor to CAPITAL ONE BANK (USA) N.A.  
(CAPITAL ONE BANK, N.A.)  
POB 41067  
Norfolk, VA 23541

Prestige Financial Services  
Attn: Bankruptcy  
1420 South 500 West  
Salt Lake City, UT 84115

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Americash Loans	End of Label Matrix	
PO Box 184	Mailable recipients	23
Des Plaines, IL 60016-0003	Bypassed recipients	1
	Total	24

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: Angel Hughes**

**Debtor**

)  
) **Case No: 17 B 11836**  
) **Judge: Doyle**  
) **Chapter 13**  
)

**MOTION TO MODIFY PLAN**

Now comes Angel Hughes (hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On April 14, 2017 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on June 20, 2017. The confirmed plan called for monthly payments of \$400.00 for 60 months, paying unsecured creditors a minimum of 10% on their claims.
3. The Debtor fell behind on plan payments because she moved in September, 2017 and had to pay \$1,000.00 toward a security deposit and moving expenses.
4. The Debtor is now caught up on her bills after moving and believes she can afford an increased plan payment of \$430.00 if her current default is deferred to the end of the plan (see attached Amended Schedules I and J, referred to as “Exhibit”).
5. If the Debtor’s plan payment is increased to \$430.00 and her default is deferred, the unsecured creditors will still receive 10% on their claims, and the plan will complete within 60 months.

**WHEREFORE**, Debtor prays that this Honorable Court enter an Order:

1. Increasing her plan payment to \$430.00;
2. Deferring her current plan payment default; and
3. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Michelle K. Hinds  
Michelle K. Hinds  
Law Office of Jason Blust, LLC  
211 W. Wacker Dr., Ste. 300  
Chicago, IL 60606  
312-273-5001